

EXHIBIT 84

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE
C.A. No. 20-613(LPS)

THOMSON REUTERS ENTERPRISE CENTRE
GMBH and WEST PUBLISHING CORPORATION,

Plaintiffs and
Counter-Defendants,

vs.

ROSS INTELLIGENCE, INC.,

Defendant and
Counter-Claimant.

** HIGHLY CONFIDENTIAL **

** ATTORNEYS' EYES ONLY **

REMOTE VIDEOTAPED DEPOSITION OF
CHARLES VON SIMSON

Tuesday, April 19, 2022

9:00 a.m. (CT)

Reported by:

Joan Ferrara, RMR, FCRR

Job No. 2022-833145

April 19, 2022

9:00 a.m. (CT)

Videotaped Deposition of CHARLES
VON SIMSON, held remotely via Zoom, before
Joan Ferrara, a Registered Merit Reporter,
Federal Certified Realtime Reporter and
Notary Public.

REMOTE APPEARANCES:

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A L S O P R E S E N T :

JACOB FIGUEROA, Lexitas

Videographer

----- I N D E X -----

WITNESS	EXAMINATION BY	PAGE
CHARLES VON SIMSON		
	MR. LOVERRO	7

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THE VIDEOGRAPHER: Good morning.
We are on the record on April 19, 2022
at approximately 9:03 Central Time for
the remote video deposition of Charles
von Simson, in the matter of Thomson
Reuters Enterprise Centre GmbH, et
al., versus ROSS Intelligence, Inc.

My name is Jacob Figueroa. I am
the videographer on behalf of Lexitas.

Will counsel please introduce
themselves for the record, who they
represent, beginning with the party
noticing this proceeding?

MR. LOVERRO: My name is Eric
Loverro. I'm an attorney for Kirkland
& Ellis. With me is also my colleague
Miranda Means. I represent Plaintiffs
Thomson Reuters and West Publishing in
this matter.

MR. STEINBERG: My name is
Joachim Steinberg. I'm an attorney
with Crowell & Moring representing
Defendant ROSS Intelligence in this
matter. With me is my colleague

VON SIMSON - HIGHLY CONFIDENTIAL/AEO

Dalton Hughes.

THE VIDEOGRAPHER: Will the court
reporter please swear in the witness.

CHARLES VON SIMSON,

called as a witness, having been duly
sworn by a Notary Public, was examined
and testified as follows:

EXAMINATION BY

MR. LOVERRO:

Q. Good morning, sir.

A. Good morning.

Q. How are you doing today?

A. Good.

Q. Could you please state your name
for the record?

A. Yeah, Charles von Simson.

Q. And could you also state your
address for the record?

A. 28 Linwood Avenue, Buffalo, New
York 14209.

Q. And is that your office or is
that your home address?

A. That's my home address.

Q. And where are you located today?

[REDACTED]

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C E R T I F I C A T E

STATE OF NEW YORK)

: ss.

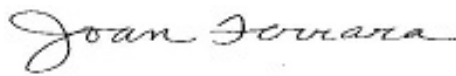
COUNTY OF NEW YORK)

I, Joan Ferrara, a Notary Public
within and for the State of New York,
do hereby certify:

That CHARLES VON SIMSON, the
witness whose deposition is
hereinbefore set forth, was duly sworn
by me and that such deposition is a
true record of the testimony given by
the witness.

I further certify that I am not
related to any of the parties to this
action by blood or marriage, and that I
am in no way interested in the outcome
of this matter.

IN WITNESS WHEREOF, I have
hereunto set my hand this 23rd day of
April, 2022.

A handwritten signature in cursive script, reading "Joan Ferrara", is written over a horizontal line.

Joan Ferrara

Signature and Errata Sheet
April 19, 2022 Deposition of Charles von Simson
Thomson Reuters Enterprise Centre GMBH and West Publishing Corporation v. ROSS
Intelligence Inc.

I, Charles von Simson, have reviewed the attached transcript of my April 19, 2022 deposition testimony and certify, pursuant 28 U.S.C. § 1746 that the attached transcript is my true and correct testimony during that deposition, subject to the corrections shown below.

Page:Line	Currently Reads	Correction	Reason
█	█	█	█
█	█	█	█
█	█	█	█
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Executed on May 16, 2022 at Madison, WI.

By: _____

